

# **EXHIBIT A**

## Civil Court Case Information - Case History

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Civil Court Case Information - Case History

**Case Information**Case Number: CV2017-053077  
File Date: 4/12/2017  
Case Type: CivilJudge: Hannah, John  
Location: Northeast**Party Information**Party Name  
Sandra Zinn  
City Of Scottsdale  
Scottsdale Police Department  
Maricopa County Sheriffs DepartmentRelationship  
Plaintiff  
Defendant  
Defendant  
DefendantSex  
FemaleAttorney  
Pro Per  
Pro Per  
Pro Per  
Pro Per**Case Documents**

Filing Date	Description
4/12/2017	COM - Complaint
4/12/2017	CCN - Cert Arbitration - Not Subject
4/12/2017	CSH - Coversheet

Docket Date	Filing Party
4/13/2017	Plaintiff(1)
4/13/2017	Plaintiff(1)
4/13/2017	Plaintiff(1)

**Case Calendar**

There are no calendar events on file

**Judgments**

There are no judgments on file

OFFICE OF THE  
CITY CLERK**ORIGINAL**

2017 MAY 23 PM 12:36

Person Filing: Sandra ZinnAddress (If not protected): 8262 E. Vista De ValleCity, State, Zip Code: Scottsdale, AZ 85255Telephone: (602)318-8080Email Address: sandrazinn1998@yahoo.comLawyer's Bar Number: N/ARepresenting ☒ Self, without a Lawyer or ☐ Attorney for ☐ Petitioner OR ☐ Respondent**SUPERIOR COURT OF ARIZONA  
IN MARICOPA COUNTY****CV2017-053077**Sandra Zinn

Case No.: \_\_\_\_\_

Name of Petitioner

And

City of Scottsdale; Scottsdale Police Department; Maricopa County Sheriff's Department

Name of Respondent

**SUMMONS**If you would like legal advice from a lawyer,  
contact the Lawyer Referral Service at602-257-4339

or

www.maricopalawyers.org

Sponsored by the

WARNING: This is an official document from the court that affects your rights. Read this carefully.  
If you do not understand it, contact a lawyer for help.FROM THE STATE OF ARIZONA TO: City of Scottsdale; Scottsdale Police Department; Maricopa CountySheriff's Department

Name of Respondent

1. A lawsuit has been filed against you. A copy of the lawsuit and other court papers are served on you with this "Summons".
2. If you do not want a judgment or order taken against you without your input, you must file an "Answer" or a "Response" in writing with the court, and pay the filing fee. If you do not file an "Answer" or "Response" the other party may be given the relief requested in his/her Petition or Complaint. To file your "Answer" or "Response" take, or send, the "Answer" or "Response" to the:

- Office of the Clerk of the Superior Court, 201 West Jefferson Street, Phoenix, Arizona 85003-2205
- OR
- Office of the Clerk of the Superior Court, 18380 North 40<sup>th</sup> Street, Phoenix, Arizona 85032 OR
- Office of the Clerk of Superior Court, 222 East Javellna Avenue, Mesa, Arizona 85210-6201 OR
- Office of the Clerk of Superior Court, 14264 West Tierra Buena Lane, Surprise, Arizona, 85374.

Mail a copy of your "Response" or "Answer" to the other party at the address listed on the top of this Summons.

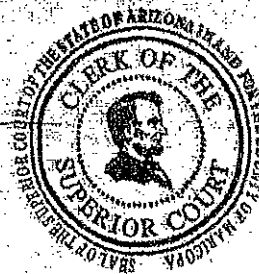


Case Number: \_\_\_\_\_

3. If this "Summons" and the other court papers were served on you by a registered process server or the Sheriff, within the State of Arizona, your "Response" or "Answer" must be filed within TWENTY (20) CALENDAR DAYS from the date you were served, not counting the day you were served. If this "Summons" and the other papers were served on you by a registered process server or the Sheriff outside the State of Arizona, your Response must be filed within THIRTY (30) CALENDAR DAYS from the date you were served, not counting the day you were served. Service by a registered process server or the Sheriff is complete when made. Service by Publication is complete thirty (30) days after the date of the first publication.
4. You can get a copy of the court papers filed in this case from the Petitioner at the address listed at the top of the preceding page, from the Clerk of the Superior Court's Customer Service Center at:
  - 601 West Jackson, Phoenix, Arizona 85003
  - 16380 North 40<sup>th</sup> Street, Phoenix, Arizona 85032
  - 222 East Javellna Avenue, Mesa, Arizona 85210
  - 14264 West Tierra Buena Lane, Surprise, Arizona, 85374.
5. Requests for reasonable accommodation for persons with disabilities must be made to the office of the judge or commissioner assigned to the case, at least ten (10) judicial days before your scheduled court date.
6. Requests for an interpreter for persons with limited English proficiency must be made to the office of the judge or commissioner assigned to the case at least ten (10) judicial days in advance of your scheduled court date.

SIGNED AND SEALED this date **APR 12 2017****MICHAEL K. JEANES, CLERK**

MICHAEL JEANES, CLERK OF COURT

By K. Masawlestewa  
Deputy ClerkK. Masawlestewa  
Deputy Clerk

**COPY**

APR 12 2017



MICHAEL K. JEANES, CLERK  
K. MAGAWIESTER, DEPUTY CLERK

Sandra Zinn  
8262 E. Vista De valle  
Scottsdale, AZ 85255  
Tel: (602)318-8080

*In Pro Se*

ARIZONA SUPERIOR COURT  
COUNTY OF MARICOPA

CV2017-053077

SANDRA ZINN,

Plaintiff,

v.

CITY OF SCOTTSDALE; SCOTTSDALE  
POLICE DEPARTMENT; MARICOPA  
COUNTY SHERIFF'S DEPARTMENT;  
DOES 1 - 20,

Defendants.

CASE NO.

CIVIL COMPLAINT FOR FALSE  
ARREST; EXCESSIVE FORCE;  
ASSAULT AND BATTERY;  
NEGLIGENCE; INTENTIONAL  
INFLECTION OF EMOTIONAL  
DISTRESS; ABUSE OF PROCESS;  
DEFAMATION; FALSE LIGHT

Jury Trial Demanded

Plaintiff allege the following facts:

1. Plaintiff SANDRA ZINN (hereafter "ZINN") is, and at relevant times herein mentioned was, an individual who resides principally in Orange County, California, and who maintains a residence in Scottsdale, Maricopa County, in the State of Arizona.

2. Defendant CITY OF SCOTTSDALE (hereafter, "SCOTTSDALE") is, and at all relevant times herein mentioned was, a city or municipality in the County of Maricopa, in the State of Arizona.

3. Defendant SCOTTSDALE POLICE DEPARTMENT (hereafter "SPD") is a government law enforcement entity that plaintiff believes is affiliated with SCOTTSDALE

1 and located in the County of Maricopa, in the State of Arizona.

2 4. Defendant MARICOPA COUNTY (hereafter "MARICOPA") is, and at all  
3 relevant times mentioned herein was, a county and government entity in the State of  
4 Arizona.

5 5. At certain relevant times herein mentioned, each of the defendants named above  
6 served as the agent, servant, representative and/or employee of each of the other  
7 defendants, and certain of the acts alleged to have been done by said defendants were done  
8 in the capacity of and as agent for each of the other defendants.

9 6. Maricopa County Superior Court has the legal authority to hear and decide this  
10 case because the value of the case exceeds \$10,000, the defendants reside in Maricopa  
11 County, and the events or actions that are the subject of this Complaint occurred in  
12 Maricopa County.

### 13 **FACTUAL SUMMARY**

14 7. Plaintiff realleges and incorporates by reference, as though fully set forth, the  
15 allegations contained in paragraphs 1 through 5 of the Complaint.

16 8. On or about April 12, 2016, defendants, primarily through the SPD, sent a team  
17 of police officers, many outfitted in full tactical gear and armaments, to plaintiff's home  
18 inside a gated community in Scottsdale. Plaintiff was not initially aware of the presence of  
19 that team of officers, or of any warrant, court order, or other ostensible or colorable legal  
20 basis for any entry by them on to the premises of her home, or for any arrest, apprehension,  
21 or detention of plaintiff, or for her adult son, Nicholas Krakana ("Krakana") who was  
22 staying there with her at the time, enjoying dinner with his young children, who are  
23 plaintiff's grandchildren.

24 9. Without any prior warning, that team of heavily armed police officers battered  
25 down plaintiff's front door to her home, and then forcefully entered and wrestled down  
26 plaintiff and her son and handcuffed them both. In the process of subduing plaintiff, a 67  
27 year old woman who offered no resistance, the officers slammed plaintiff's head against the  
28

1 surface of the floor. The police officers, who later were identified as members of defendant  
 2 SPD, then arrested plaintiff, and transported her to and detained her in a jail facility, where  
 3 they caused her further injury and violation of her Constitutional, common law and statutory  
 4 rights.

5 10. The acts of defendants herein alleged were done under color of state law, and  
 6 deprived plaintiff of rights secured by the Constitution or federal statutes, in addition to any  
 7 applicable state statutes.

8 11. Plaintiff has satisfied and complied with any requirement(s) to provide notice of  
 9 her claims alleged in the Complaint to defendants, and did so within the periods proscribed  
 10 or required by law.

11 **FIRST CAUSE OF ACTION**  
 12 **(False Arrest / Imprisonment)**

13 12. Plaintiff realleges and incorporates by reference, as though fully set forth, the  
 14 allegations contained in paragraphs 1 through 11 of the Complaint.

15 13. Plaintiff was wrongfully arrested, detained, and confined, without a warrant or  
 16 probable cause, and in violation of plaintiff's rights of due process, and other rights  
 17 protected by the Constitution, including plaintiff's Fourth Amendment rights and applicable  
 18 statutes.

19 14. As a direct and proximate result of the above unlawful conduct, plaintiff  
 20 suffered harm and damages, including, without limitation, physical injury, damage to  
 21 property, financial loss and severe emotional distress, in an amount to be proved at trial, and  
 22 above the jurisdictional amount required by this Court.

23 15. The actions of defendants alleged above were malicious, oppressive, and  
 24 fraudulent, and plaintiff is therefore entitled to an award of punitive damages.

25 **SECOND CAUSE OF ACTION**  
 26 **(Excessive Force)**

27 16. Plaintiff realleges and incorporates by reference, as though fully set forth, the  
 28 allegations contained in paragraphs 1 through 15 of the Complaint.

17. Defendants herein used force in arresting and detaining plaintiff. The force used by defendants was excessive, and in violation of applicable laws, regulations, and standards of care.

18. At the time that defendants used excessive force as alleged above, defendants were acting or purporting to act in the performance of their official duties.

19. As a direct and proximate result of defendants' use of excessive force against plaintiff, plaintiff has suffered harm and damages, including, without limitation, physical injury, damage to property and severe emotional distress, in an amount to be proved at trial and above the jurisdictional amount required by this Court, and defendants' use of excessive force was a substantial factor in causing such harm.

20. The actions of defendants herein were malicious, wanton, and oppressive, and plaintiff is therefore entitled to an award of punitive damages.

### THIRD CAUSE OF ACTION (Assault And Battery)

21. Plaintiff realleges and incorporates by reference, as though fully set forth, the allegations contained in paragraphs 1 through 20 of the Complaint.

22. By their actions alleged above, defendants intentionally engaged in or caused nonconsensual and harmful or offensive contact against or with plaintiff, and put her in apprehension of personal harm.

23. As a direct and proximate result of the above-alleged wrongful acts, plaintiff has suffered harm and damages, including physical injury and severe emotional distress, in an amount to be proved at trial.

24. The actions of defendants herein were willful, malicious, wanton and oppressive, and plaintiff is thereby entitled to an award of punitive damages.

### FOURTH CAUSE OF ACTION (Negligence)

25. Plaintiff realleges and incorporates by reference, as though fully set forth, the allegations contained in paragraphs 1 through 24 of the Complaint.



1       26. At relevant times herein, defendants owed plaintiff a duty of reasonable care,  
 2 including a duty to exercise their authority as law enforcement officers under the standards  
 3 of care, professionalism, and compliance with applicable statutes and Constitutional  
 4 provisions governing members of their occupation and profession.

5       27. Defendants have breached their duty of care to plaintiff, by their wrongful acts  
 6 alleged herein.

7       28. As a direct and proximate result of defendants' negligence, defendants have  
 8 caused substantial harm and damage to plaintiff, including physical injury, damage to  
 9 property, and severe emotional distress, in an amount to be proved at trial.

10                               **FIFTH CAUSE OF ACTION**  
 11                               **(Abuse Of Process)**

12       29. Plaintiff realleges and incorporates by reference, as though fully set forth, the  
 13 allegations contained in paragraphs 1 through 28 of the Complaint.

14       30. Plaintiff is informed and believes, and thereon alleges, that defendants engaged  
 15 in willful acts against plaintiff under color of law, for improper purposes, including the  
 16 wrongful, unprivileged and unlawful entry into plaintiff's home, and the arrest, detention  
 17 and confinement of plaintiff, which constituted abuse of legal process.

18       31. As a direct and proximate result of defendants' wrongful acts, plaintiff has  
 19 suffered harm and damages, including physical injuries, property damage, and severe  
 20 emotional distress, in an amount to be proved at trial.

21       32. The foregoing acts were willful, malicious, wanton and oppressive, and plaintiff  
 22 is therefore entitled to an award of punitive damages.

23                               **SIXTH CAUSE OF ACTION**  
 24                               **(Defamation)**

25       33. Plaintiff realleges and incorporates by reference, as though fully set forth, the  
 26 allegations contained in paragraphs 1 through 32 of the Complaint.

27       34. Plaintiff is informed and believes, and thereon alleges, that defendants have  
 28 published false and unprivileged statements, in oral and written form, of alleged fact

1 regarding plaintiff, to various persons, including members of the public. Plaintiff is  
 2 informed and believes and thereon alleges that these publications falsely stated or implied  
 3 that plaintiff had engaged in various acts that constituted criminal conduct and/or violations  
 4 of law and illegal or immoral behavior.

5 35. These false and unprivileged statements regarding plaintiff were of such a  
 6 nature that they naturally would, and did, injury plaintiff in her reputation.

7 36. As a direct and proximate result of defendants' wrongful, false and defamatory  
 8 statements and their publication to other persons, as alleged above, plaintiff has suffered  
 9 damages, including severe emotional distress, and injury to her professional reputation, all  
 10 in an amount to be proved at trial.

11 37. Plaintiff is informed and believes, and thereon alleges, that the defamatory  
 12 statements were made with malice and oppression against plaintiff, and were intended to  
 13 vex, annoy or injure plaintiff, based on ill will toward plaintiff by defendants, and that  
 14 plaintiff is therefore entitled to an award of punitive damages.

15 **SEVENTH CAUSE OF ACTION**  
 16 **(False Light)**

17 38. Plaintiff realleges and incorporates by reference as though fully set forth, the  
 18 allegations contained in paragraphs 1 through 36 of the Complaint.

19 39. Defendants made publications and communications to the public that contained  
 20 unfair or inaccurate depictions of plaintiff and/or of actions or omissions attributed to  
 21 plaintiff, that placed plaintiff in a false light that was highly offensive to a reasonable  
 22 person.

23 40. As a direct and proximate result of defendants' wrongful actions as alleged  
 24 above, plaintiff has suffered harm and damages, including severe emotional distress and  
 25 damage to her reputation, in an amount to be determined at trial.

26 41. Plaintiff is informed and believes, and thereon alleges, that the actions of  
 27 defendants were willful, malicious, wanton and oppressive, and plaintiff is therefore entitled  
 28 to an award of punitive damages.

**EIGHTH CAUSE OF ACTION**  
**(Intentional Infliction of Emotional Distress)**

42. Plaintiff realleges and incorporates by reference, as though fully set forth, the allegations contained in paragraphs 1 through 41 of the Complaint.

43. Plaintiff is informed and believes, and thereon alleges, that by their actions alleged herein, defendants engaged in outrageous conduct with the intent to cause, or with reckless disregard of the probability of causing, emotional distress to plaintiff.

44. As a direct and proximate result of defendants' actions alleged herein, plaintiff has suffered damages, including physical injury, financial harm, and severe emotional distress, in an amount to be proved at trial and above the jurisdictional amount required by this Court.

45. The actions of defendants alleged above were malicious, oppressive, wanton and fraudulent, and plaintiff is therefore entitled to an award of punitive damages.

WHEREFORE, plaintiffs request a jury trial, and prays for relief as follows:

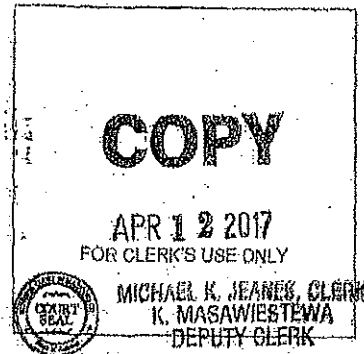
1. For general and compensatory damages in an amount to be proved at trial, but not less than \$1,000,000;
2. For consequential and special damages, in an amount to be proved at trial;
3. For damages for severe emotional distress;
4. For damages to reputation;
5. For punitive damages;
6. For attorney's fees and costs of suit; and
7. For such other and further relief as the Court may deem just and proper.

Dated: April 11, 2017

By: 

Sandra Zinn  
In Pro Se

Person Filing: Sandra Zinn  
Address (If not protected): 8262 E. Vista De Valle  
City, State, Zip Code: Scottsdale, AZ 85255  
Telephone: (602)318-8080  
Email Address: sandrazinn1998@yahoo.com  
Lawyer's Bar Number: N/A  
Representing ☒ Self, without a Lawyer or ☐ Attorney for ☐ Petitioner OR ☐ Respondent



SUPERIOR COURT OF ARIZONA  
IN MARICOPA COUNTY

Sandra Zinn  
PLAINTIFF

vs.

City of Scottsdale Police Department  
Maricopa County Sheriff's Department  
DEFENDANT

CV2017-053077

Case Number:

CERTIFICATE OF COMPULSORY  
ARBITRATION

The undersigned certifies that the largest award sought by the complainant, including punitive damages, but excluding interest, attorneys' fees, and costs does / does not exceed limits set by Local Rule for compulsory arbitration. This case is / is not subject to compulsory arbitration as provided in Rules 72 through 77 of the Rules of Civil Procedure.

SUBMITTED this Ninth day of April, 2017.

BY